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Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

**IN RE: VIAGRA (SILDENAFIL CITRATE)
PRODUCTS LIABILITY LITIGATION**

Master File No.: 3:16-md-02691-RS

MDL No. 2691

This Document Relates to: ALL ACTIONS

**DECLARATION OF RACHEL ABRAMS
IN SUPPORT OF PLAINTIFFS' NOTICE
OF COMMON BENEFIT ACCOUNTING**

FILED UNDER SEAL

I, Rachel Abrams, declare as follows:

1. I am a partner with the law firm of Levin Simes Abrams LLP, Liaison Counsel for Plaintiffs in the above-captioned action. I am familiar with the matters set forth in this declaration based upon my own personal knowledge and my review of the files maintained in this case. If called as a witness, I could and would competently testify to the following facts.
 2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Common Benefit Accounting through July 9, 2018.

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1 Pursuant to Title 28 of the United States Code §1746, I declare under penalty of perjury
2 that the foregoing is true and correct.

3 Dated: July 25, 2018. Respectfully submitted,

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5 /s/ Rachel Abrams
6 Rachel Abrams (CA #209316)
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10 *Liaison Counsel for Plaintiffs*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that a copy of the foregoing was electronically filed through the Court's
3 CM/ECF system on July 25, 2018, which shall send notification of such filing to all CM/ECF
4 participants.

5 _____
6 */s/Rachel Abrams* _____
7 Rachel Abrams
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